

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
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This document relates to:

Ashton, et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(SN) (and member case
Burlingame v. Bin Laden, et al., 02-cv-7230)
Ashton, et al. v. Kingdom of Saudi Arabia, 17-cv-02003 (GBD)(SN)

**DECLARATION OF JOHN F. SCHUTTY, ESQ.
IN SUPPORT OF APPLICATION TO SUBSTITUTE COUNSEL**

John F. Schutty, pursuant to 28 U.S.C. § 1746, declares under the penalty of perjury under the laws of the United States of America, that the following is true and correct:

1. I am an attorney admitted to practice before this Court. I submit this Declaration in support of a consent application (Local Civil Rule 1.4) to substitute my law firm, the Law Office of John F. Schutty, P.C., in the place and stead of the law office of Speiser Krause, P.C., on behalf of Plaintiff, Eileen Lynch, Individually as Spouse and as Personal Representative of the Estate of Farrell Lynch, Deceased, and the adult children of Decedent Farrell Lynch, and Plaintiffs Meghan Lynch, Kathleen Lynch and Anne Lynch. I am personally familiar and attest to the truth of the facts that follow below.

2. This MDL litigation is still in the midst of the discovery that is being handled by a Plaintiffs' Steering Committee, so there will be no prejudice to the Plaintiffs or the Defendants by the requested substitution of the Plaintiff's original counsel.


3. The attached "Consent" shows that these Plaintiffs, their outgoing attorney (Frank Granito), their incoming attorney (John F. Schutty), and plaintiffs' MDL Liaison Counsel (James Kreindler) all consent to the substitution.

4. Similar “Consents” have previously been filed for Plaintiffs Irene Dickey, Dara Seaman, Allison Wallice, Joanne Kelly, Susan Sliwak, Jacqueline Eaton-Garland and Lisa O’Brien; those “Consents” also were appropriately signed by those Plaintiffs and the aforementioned attorneys and were previously “so-ordered” by this Court.

5. In light of Plaintiffs’ wishes, and their attorneys’ consent, I respectfully request that this substitution be completed without delay, by the court “so-ordering” the attached “Consent.”

Dated: New York, New York
December 5, 2019

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



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